

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions

**SUPPLEMENT TO THE PLAINTIFFS' STEERING COMMITTEE'S PROPOSED
AGENDA FOR THE MARCH 10, 2016 STATUS CONFERENCE
AND DISCOVERY HEARING**

The Saint Thomas Entities¹ propose the following supplement to the PSC's proposed agenda for the March 10, 2016 status conference (before both Judge Zobel and Judge Boal at 2:00 p.m.) (Docket #2727). The Saint Thomas Entities proposed this change to the agenda to the PSC in advance of its submission to the Court, but the PSC did not include it. The Saint Thomas Entities believe the bellwether selection issues warrant a bilateral discussion with input from both sides, rather than solely a mention by the PSC in its litigation update. There are no other matters set for argument at the status conference, and the Saint Thomas Entities submit that argument on the bellwether selection issues can be brief.

The Saint Thomas Entities propose the following addition after part A of the PSC's proposed agenda:

**B. MATTERS FOR WHICH ORAL ARGUMENT IS REQUESTED DURING THE
STATUS CONFERENCE**

a. Selection of Bellwether Trial Cases

- i. Nashville Defendants Summary of Remaining Bellwether Candidates
[Dkt. 2660]

¹ Defendants Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network.

- ii. PSC Summary of Remaining Bellwether Candidates [Dkt. 2661]
- iii. Saint Thomas Entities' Response to PSC's Summary of Remaining Bellwether Cases [Dkt. 2724]

Dated: March 9, 2016

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS
NETWORK, AND SAINT THOMAS
HEALTH

By their attorneys,
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CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served on all parties of record through the Court's electronic filing system this 9th day of March, 2016.

/s/ Sarah P. Kelly
SARAH P. KELLY